

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL No. 1456
LITIGATION)	
_____)	CIVIL ACTION: 01-CV-12257-PBS
)	
THIS DOCUMENT RELATES TO)	Chief Mag. Judge Marianne B. Bowler
ALL CLASS ACTIONS)	
_____)	

**PLAINTIFFS' MOTION TO COMPEL
THE JOHNSON & JOHNSON GROUP TO PRODUCE
DOCUMENTS AND FOR AN EXTENSION OF DISCOVERY**

Plaintiffs hereby move, pursuant to Federal Rule of Civil Procedure 37, for a motion to compel defendant Ortho Biotech Products, LP to produce all responsive documents and litigation materials relating to certain legal proceedings, the relevancy of which OBI has improperly concealed from plaintiffs during the discovery period. Plaintiffs also seek a sixty (60) day extension of discovery with respect to taking any necessary discovery in connection with the late production of such documents and litigation materials. The grounds for this Motion are set forth in the accompanying Memorandum of Law.

Dated: August 16, 2005

By: /s/ Allan M. Hoffman
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CERTIFICATE OF SERVICE

I hereby certify that I, Allan Hoffman, an attorney, caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION TO COMPEL THE JOHNSON & JOHNSON GROUP TO PRODUCE DOCUMENTS AND FOR AN EXTENSION OF DISCOVERY** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on August 16, 2005, a copy to Verilaw Technologies for Posting and notification to all parties.

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